

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GRANT CARDONE, an individual,

Plaintiff and Counterclaim
Defendant,

v.

STONER & ASSOCIATES, INC., a Washington
corporation, and MIKE STONER, an individual,

Defendants and
Counterclaim Plaintiffs.

DEALER DATA SERVICES, a Washington
sole proprietorship,

Counterclaim Plaintiff,

v.

THE CARDONE GROUP OF CENTRAL
FLORIDA, INC., a Florida corporation; THE
CARDONE GROUP, a Florida business entity;
CARDONE ENTERPRISES GROUP, INC., a
Florida corporation; G. CARDONE
ENTERPRISES, INC., a California corporation;
SCOTT MORGAN, an individual,

Counterclaim Defendants.

Case No. CV03-00513 RSM

STIPULATION AND ORDER TO:

**1. RE-NOTE DEFENDANT AND
COUNTERCLAIM PLAINTIFF'S
MOTION FOR PARTIAL SUMMARY
JUDGMENT; AND**

**2. EXTEND THE DISCOVERY
CUTOFF TO ACCOMMODATE THE
DEPOSITION OF PLAINTIFF
GRANT CARDONE**

1 The parties hereby stipulate and agree to re-note Defendant and Counterclaim Plaintiffs'
2 Motion for Partial Summary Judgment (the "Motion"), currently noted on the Court's motion
3 calendar for April 29, 2005, as follows:

- 4 1. Defendant and Counterclaim Plaintiffs' Reply will be due May 2, 2005; and
- 5 2. The Motion will be re-noted for adjudication on May 6, 2005.

6 FURTHER, the parties hereby stipulate and agree to extend the discovery cutoff date,
7 presently May 31, 2005, to accommodate the deposition of Grant Cardone and we agree that his
8 deposition may be taken at a mutually convenient date after the cutoff.

9 All other dates in this matter remain the same.

10 Dated this 28th day of April, 2005.

11 ATER WYNNE LLP

12
13 /s Paul E. Brain
14 Paul E. Brain, WSBA #13438
15 601 Union St., Suite 5450
16 Seattle, WA 98101-2327
Telephone: 206-623-4711
Fax: 206-467-8406
Email: peb@aterwynne.com

17 Attorneys for Defendants and Counterclaim
18 Plaintiffs Stoner & Associates, Inc., and Mike
Stoner

19 BOGIN, MUNNS & MUNNS

20
21 /s Terrance F. Brennan
22 Terence F. Brennan, FSBA No. 0007218
23 (Admitted Pro Hac Vice)
24 2601 Technology Drive
Orlando, FL 32804
Telephone: (407) 578-1334
Fax: (407) 578-2181
Email: tbrennan@boginmunns.com

25 - and -

CHRISTENSEN O'CONNOR JOHNSON
KINDNESS PLLC

Jerald E. Nagae, WSBA No. 8521
W. David Shenk, WSBA No. 30797

Attorneys for Plaintiff Grant Cardone and the Third
Party Defendants

ORDER

The Court having considered the stipulation by the parties in this matter, and good case
appearing therefore,

IT IS SO ORDERED that:

1. Defendant and Counterclaim Plaintiffs' Reply is now due Monday, May 2, 2005;
2. Defendant and Counterclaim Plaintiffs' Motion for Partial Summary Judgment
currently noted for Friday, April 29, 2005, will be re-noted for adjudication May 6, 2005;
3. The discovery cutoff date, presently May 31, 2005, will be extended to
accommodate the deposition of Grant Cardone so that his deposition may be taken at a mutually
convenient date after the cutoff; and
4. All other dates in this matter remain the same.

Dated this 9 day of May, 2005.

/s/ Ricardo S. Martinez
RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE